

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF OKLAHOMA**

1. Penny Farley; and 2. David Farley,	Plaintiffs,	Case No.: 21-cv-047-SPS
vs.		
1. Ben Wade; and 2. EAN Holdings, LLC d/b/a Enterprise Rent-A-Car	Defendants.	

PLAINTIFFS' INITIAL DISCLOSURES

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may support its claims or defenses, unless solely for impeachment, identifying the subjects of the information:

1. Penny Farley, Plaintiff, may be contacted through counsel.
2. David Farley, III Plaintiff, may be contacted through counsel.
3. Ben Wade, Defendant, may be contacted through counsel.
4. EAN Holdings, LLC d/b/a Enterprise Rent-A-Car, Defendant, may be contacted through counsel.
5. Investigating Officer Jeff Webster – Henryetta Police Department
6. Each medical provider who treated the Plaintiffs as indicated in Plaintiffs' medical records.

B. A copy of, or description by category and location of, all documents, data, compilations, and tangible things that are in the possession, custody or control of the disclosing party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

1. Plaintiffs' medical bills in possession of Plaintiffs' counsel.
2. Plaintiffs' medical records in possession of Plaintiffs' counsel.

3. Official Oklahoma Traffic Collision Report, a copy of which is in possession of Plaintiffs' counsel.
4. Property damage photographs, a copy of which are in the possession of Plaintiffs' counsel.

C. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 of the documents or other evidentiary material, not privileged or protected from disclosure, on which such computations are based, including materials bearing on the nature and extent of the injuries suffered.

Plaintiffs David and Penny Farley:

- i. Past medical expenses: To be determined by a jury.
- ii. Past physical pain and suffering: To be determined by a jury.
- iii. Future medical expenses: To be determined by a jury.
- iv. Future physical pain and suffering: To be determined by a jury.
- v. Permanent impairment: To be determined by a jury.
- vi. Lost wages: To be determined by a jury.
- vii. Punitive damages: To be determined by a jury.

Respectfully submitted,

/s/ Andrea R. Clinger

Andrea R. Clinger, OBA #31910

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CERTIFICATE OF SERVICE

I certify that on April 5, 2021 a true and correct copy of Plaintiff's Initial Disclosures was served to each person listed below by the method indicated.

VIA ECF:

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/s/ Andrea R. Clinger
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